

# Exhibit J

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**From:** Ekelman, Felice B. (NYC) [mailto:EkelmanF@JacksonLewis.com]  
**Sent:** Monday, October 26, 2015 11:34 AM  
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**Subject:** Foster and De La Cruz discovery issue

Greg, last week during our meet and confer we discussed Plaintiffs' demand that Defendants collect the emails of all managers of individuals holding the JOS, AJOS, CPS and CPSS titles. We discussed whether Defendant would agree to collect emails from a limited number of managers in each of the above cases (and apply the same search terms as we have previously agreed upon), in lieu of Plaintiffs' request for all emails for all managers.

We have spoken with our client, and propose that Plaintiffs identify three (3) managers each in Foster and De la Cruz. Rather than take the time to identify all the managers of the JOS, AJOS, CPS and CPSS positions, and randomly select three, it is more efficient if Plaintiffs simply tell Defendant which managers' emails you would like Defendants to collect. As we discussed we anticipate it may take several months to collect these emails, and this will expedite the process.

Please let us know if this resolves the parties' dispute.

Felice

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